

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
Team Systems International, LLC,	Case No. 22-10066 (CTG)
Debtor.	<b>Re: D.I. 272</b>
George L. Miller, solely in his capacity as the Chapter 7 Trustee of Team Systems International, LLC,	
Plaintiff,	Adv. Proc. No. 23-50004 (CTG)
-against-	<b>Re: Adv. D.I. 3</b>
Deborah Evans Mott, Steven M. Acosta, Christopher Mott, John S. Maciorowski, Addy Road, LLC, Brent Road LLC, Benjamin P. Smith, Jessica M. Smith, and TSI Gulf Coast, LLC, and	
John Does 1-100,	
Defendants.	

**ORDER GRANTING THE MOTION OF THE CHAPTER 7 TRUSTEE  
FOR ENTRY OF AN ORDER (I) EXTENDING THE FREEZE AND  
GRANTING PRELIMINARY INJUNCTIVE RELIEF, AND (II) GRANTING  
RELATED RELIEF, PURSUANT TO 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 7065  
WITH RESPECT TO DEFENDANT TSI GULF COAST, LLC**

Upon consideration of the motion (the “Motion”)<sup>1</sup> filed by George L. Miller, solely in his capacity as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Team Systems International, LLC, for entry of an order (i) extending and expanding the Freeze and granting

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<sup>1</sup> Capitalized terms used but not defined in this Order have the meanings set forth in the Motion.

preliminary injunctive relief; (ii) prohibiting the Defendants from selling, assigning, transferring, encumbering, or otherwise disposing of the Real Properties; (iii) prohibiting the Defendants from transferring or disposing of the Fraudulent Transfers, as to each Defendant, in the amounts set forth on Exhibit A to the Complaint; (iv) directing the Defendants to account to the Trustee; and (v) for related relief, pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 7065 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and Trustee having filed a Certificate of Service [Main Case D.I. 279; Adv. D.I. 10] reflecting that the Motion and notice of hearing were served upon, among others, the manager and the registered agent of Defendant TSI Gulf Coast, LLC (“TSI Gulf Coast”); and the Court having conducted an evidentiary hearing on January 23, 2022 (the “Hearing”) on the Motion; and TSI Gulf Coast did not interpose an objection to the Motion or appear at the Hearing; and based upon the entire record before the Court, including the evidence presented and the arguments raised at the Hearing and for reasons to be set forth in further detail in a Memorandum Opinion to be issued as soon as practicable; the Court finds and concludes as follows:

A. The District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b), which has been referred to this Court. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408; 1409.

B. Pursuant to section 105 of the Bankruptcy Code and Bankruptcy Rule 7065, this Court finds it appropriate to enter to grant the relief set forth in this Order.

C. The legal and factual bases set forth in the Motion, the Complaint, other supporting papers, and on the record at the evidentiary hearing on the Motion establish just cause for the relief granted herein.

Based upon these findings, it is hereby ORDERED that:

1. The Motion is granted with respect to TSI Gulf Coast to the extent set forth herein.

2. TSI Gulf Coast, its agents and assigns shall not transfer, encumber, or otherwise dispose of \$766,062.50 or assets of equivalent value.

3. Within fifteen (15) days of the date of entry of this Order, TSI Gulf Coast shall provide to the Trustee a full disclosure of all its assets and liabilities, as well as supporting documentation including but not limited to copies of all current bank statements, brokerage statements, and other financial account statements, together with an affidavit or declaration sworn under penalty of perjury that such Defendant's accounting of assets and liabilities is full, complete and accurate.

4. Pursuant to Bankruptcy Rule 7065, the Trustee is relieved from posting any security pursuant to Rule 65(c) of the Federal Rules of Civil Procedure.

5. The Trustee shall serve a copy of this Order on TSI Gulf Coast within two (2) days by email upon TSI Gulf Coast's manager and registered agent and by first class mail to TSI Gulf Coast's last known address.

6. This Order shall be effective immediately upon entry.

7. The Court retains jurisdiction over this Order and the relief granted herein.

**Dated: January 27th, 2023**  
**Wilmington, Delaware**



**CRAIG T. GOLDBLATT**  
**UNITED STATES BANKRUPTCY JUDGE**